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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	CASE NO. CR-14-00237 JST
)	
Plaintiff,)	STIPULATION AND PROPOSED ORDER TO
)	EXCLUDE TIME FROM THE SPEEDY TRIAL
v.)	ACT CALCULATION (18 U.S.C. § 3161(h)(7)(A))
)	
ANTHONY KESLINKE,)	
)	
Defendant.)	
)	
)	
)	

The defendant appeared for a status conference in front of the Court on April 10, 2015. At the status conference, the defendant requested additional time to review discovery in the case and to continue plea negotiations with the government. At the request of the parties, the Court scheduled a change of plea hearing on May 22, 2015, at 9:30 a.m. Furthermore, the parties agreed that excluding time until May 22, 2015, would be appropriate to allow defense counsel time to review the large amount of discovery in the case.

Therefore, the parties agree, and the Court finds and holds, as follows:

1. The defendant is currently out of custody.

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2. Given the need for additional time for defense counsel to review discovery and negotiate a plea agreement with the government, an exclusion of time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(B)(iv), is appropriate to allow for effective preparation of counsel, taking into account the exercise of due diligence. The defendant agrees to this exclusion on the condition that his right to bring motions claiming Speedy Trial Act violations prior to April 10, 2015, shall remain preserved.

3. Counsel for the defendant believes that the exclusion of time is in her client's best interest.

4. Given these circumstances, the Court finds that the ends of justice served by excluding the period from April 10, 2015, through May 22, 2015, outweigh the best interest of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

5. Accordingly, the Court orders that the period from April 10, 2015, through May 22, 2015, shall be excluded from Speedy Trial Act calculations under 18 U.S.C. § 3161(h)(7)(A) & (B)(iv).

IT IS SO STIPULATED:

DATED: April 13, 2015

_____/s_____
AARON D. WEGNER
Assistant United States Attorney

DATED: April 13, 2015

_____/s_____
MARTHA BOERSCH
Attorney for Anthony Keslinke

IT IS SO ORDERED.

DATED: April 13, 2015



HON. JON S. TIGAR
United States District Judge